



# PORT OF SIUSLAW

**Serving Western Lane County and The Central Oregon Coast**

**Creating quality jobs and business opportunities through development and application of local natural resources and unique culture**

8 July 2008

Section of Environmental Analysis  
Surface Transportation Board  
395 E St. SW  
Washington, DC 20423

Re: Docket No. AB-515 (Sub-No. 2X), *Central Oregon & Pacific Railroad, Inc. – Abandonment and Discontinuance – in Coos, Douglas, and Lane Counties, OR (Coquille to Vaughn)*

## Section of Environmental Analysis:

The Port of Siuslaw encompasses a significant portion of the area served by CORP. This area includes Canary, Cushman, Mapleton, Swisshome and Deadwood. In my role as Port Manager of the Port of Siuslaw, I never received the "Combined Environmental and Historic Report" of the Central Oregon & Pacific Railroad ("CORP") regarding CORP's planned abandonment of the rail line which passes through these areas in the Port of Siuslaw's district. CORP apparently did not see fit to include this Port in their correspondence. Instead, I had to have a copy forwarded to me by another entity.

The Port of Siuslaw was established in 1909 and has a district of over 700 square miles that reaches as far inland as Lorane. Florence is a coastal city of about 9000 residents, a combined area population of around 20,000 and was built on the timber and fishing industries.

The rail line was an integral part of the local economy that served the timber industry and more. The aforementioned sites were active rail service sites in this Port district. Lumber loaded on to barges at upriver industrial sites was transported as far away as Hawaii and Vietnam. Lumber and other products were transported by rail to markets around the country.

Business runs in cycles and we expect new uses to emerge that will make use of the rail line. The potential to combine short sea shipping options utilizing rail transportation is one possibility as fuel prices increase. However, the proposed abandonment is troubling for the local economy as well as for the environment.

Prime sport and commercial fishing and crabbing grounds lie just offshore and are augmented by a Siuslaw River sport fishery. With close proximity to many central coast freshwater lakes, fishing and other boating related activities take place in this area. The Oregon Dunes National Recreation Area is only minutes away and draws year round visits from those who ride the dunes.

While tourism and retirement related business draw large revenue streams to the area, industrial sites that can be served by rail are important future considerations. The Port of Siuslaw owns a 40 acre parcel in the City of Florence that is deemed "shovel ready" by the State of Oregon. Having nearby rail service can be a key factor in attracting business to a comparatively disadvantaged part of Lane County. CORP's Report raises a number of issues that are worrisome to the Port of Siuslaw, and I would like to use this opportunity to share these concerns with the Section of Environmental Analysis of the Surface Transportation Board.

First, I am concerned about the increased truck traffic that will result from the abandonment of the rail line. The Report notes that a total of 37,656 truck trips per year (18,828 full and 18,828 empty) will be created by the abandonment, with many of these truck trips traveling through Florence on U.S. Route 101 to Newport or on State Highway 126 to Eugene and I-5.

U.S. 101 is mostly a two lane undivided highway. The magnitude of this truck traffic increase would negatively impact the quality of life in Florence because Route 101 is one of the main streets [or is "Main Street"] in Florence. We have already seen an increase in truck traffic since the rail line has been shut down. On page 9, the Report states that the increase only represents 5 trucks per hour, but such a calculation is based on a 24-hour work day, six days per week. When using a more conventional 9-hour work day and 5-day work week, the increase in truck traffic is over 16 trucks per hour. Additionally, the Report appears to disregard the traffic and other truck impacts by stating that the rail line is in a "rural area," but Route 101 travels directly through Florence. If CORP is allowed to abandon the rail line, I urge the Section of Environmental Analysis to look closely at the traffic, safety, noise, and air pollution impacts of this abandonment and impose conditions to mitigate this harm.

State Highway 126 is also a two lane undivided highway that connects Florence and Mapleton to Eugene. Eugene is the second largest metropolitan area in Oregon and is the site of a major rail switching yard. The degraded condition of this road would be exacerbated by the increased truck traffic. The negative effects are amplified by the fact the State of Oregon has few available funds to maintain this road even in this distressed condition.

Secondly, as described on page 13 of the Report, the planned deconstruction or "salvage" of the rail line and the rail bridge over the Siuslaw River raises a number of questions about the impact on the local environment. If CORP is permitted to abandon this rail line, the rail bridge over the Siuslaw River will have to be removed. However, the removal will have significant consequences that must be mitigated.

As I stated above, recreation and tourism has been growing as people take advantage of the nearby Oregon Dunes National Recreation Area, fishing on the Siuslaw River, and other outdoor activities. The Siuslaw is known as one of the best fishing rivers in the western United States, and passes through Florence (as well as Mapleton, Swisshome, Deadwood and Cushman) on its way from the Coast Range Mountains to the Pacific Ocean. Avid anglers come from across Oregon and out of state to try their hand at fly fishing in the Siuslaw and its tributaries. Boat or shore based fishing is a staple of our local economy. Local fishing guides, hotels, restaurants, and other businesses benefit from the popularity of fishing and outdoor activities in the greater Florence area.

Chinook Salmon, Coho Salmon and Steelhead Trout are just a few of the fish that can be found in the Siuslaw. Crucially, all three of these species are born in the river, and then spend their adulthood in the ocean before returning to spawn in the river. I am concerned that CORP has not properly addressed environmental concerns associated with the removal of the Siuslaw River rail bridge, as well as the removal of tracks in the vicinity of the river and its tributaries. Without proper environmental mitigation, this salvage activity will damage the water quality of the Siuslaw River by introducing sediment into the water and by increasing the possibility of future erosion from the riverbanks and streambanks in the area. Increased sedimentation will damage the water quality and may deter salmon and trout from reaching the ocean and/or returning to spawn.

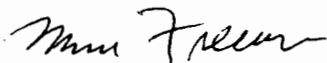
I am also concerned CORP's Report does not address the fact that the bridge removal process itself may result in contamination of the water from things such as bridge debris, paint, oils, or grease. As described on page 15 of the Report, I notice that CORP is planning no mitigation actions in connection with the planned abandonment. I urge the Section of Environmental Analysis to carefully consider the water quality impacts of CORP's plan to de-construct and salvage the rail line and the Siuslaw River bridge and impose appropriate mitigation to ameliorate the harm it would otherwise cause.

The Cushman Bridge over the Siuslaw River incorporates a crossing of State Highway 126. In removal of this bridge during the proposed abandonment process, significant engineering and disruption may occur. During the demolition, rebuilding and/or reconfiguration phases, there may be negative impacts on the Port, the City of Florence, the State of Oregon and business far beyond surrounding communities such as Mapleton.

The Federal government considers the Siuslaw River navigable up to Mapleton. The bridge over the Siuslaw River at Cushman is usually kept in the closed position, but can be opened with one to as many as three days notice?! This situation can hinder pleasure as well as commercial activities. If CORP can be seen as unresponsive toward customer service issues, how will they act (or be held to account) if the rail were to be abandoned and there arose subsequent economic or environmental consequences related to this proposed abandonment?

Thank you for this opportunity to participate in the abandonment proceeding. Please do not hesitate to contact me if you have any questions.

Sincerely,



Mark Freeman  
Port Manager

cc: Terence M. Hynes, attorney for CORP